

# HEDIN LLP

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January 14, 2025

## By ECF and Facsimile

The Honorable Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

Re: *Kristi Jordan v. Crunch, LLC*, No. 1:24-cv-7118  
Unopposed Letter Motion for Extension of Time to Oppose Motion to Compel  
Arbitration

Dear Judge Hellerstein,

We represent Plaintiff Kristi Jordan in the above-referenced action. Pursuant to Rule 7.1(d) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York and Rule 1(D) of this Court's Individual Rules, we write to request that Plaintiff's deadline to oppose Defendant's Motion to Compel Arbitration (ECF No. 18) (the "Motion"), currently January 20, 2025, be extended to March 14, 2025. Defendant consents to this request in connection with the parties' agreement described below.

This is Plaintiff's second request for an extension of its deadline to respond to the Motion. Plaintiff respectfully submits that there is good cause for the extension. The parties are currently negotiating a stipulated discovery and briefing schedule for resolving Defendant's Motion. The parties anticipate that the stipulated schedule will incorporate (1) Defendant seeking unopposed leave to file an amended Motion (and accompanying memorandum and declaration), and (2) a March 14, 2025 deadline for Plaintiff to oppose the Motion.

The parties anticipate submitting the stipulated discovery and briefing schedule to the court shortly. However, they are still finalizing certain details and awaiting client approvals, and understand that the Court may not be able to rule on the stipulated schedule until after the current January 20, 2025 deadline for Plaintiffs to oppose the Motion. Plaintiffs therefore respectfully submit this unopposed letter motion seeking an extension of the opposition deadline until March 14, 2025.

This request will not affect any other deadlines currently scheduled in this case.

Respectfully submitted,

/s/ Tyler K. Somes  
Tyler K. Somes

cc: Counsel of record (via ECF)